

**William X Nietzsche  
Julie Metcalf Kinney  
c/o 4406 N Mississippi Avenue  
Portland, Oregon [97217]  
503-287-6494**

**IN THE UNITED STATES DISTRICT COURT**

FILED 30 APR '19 16:24 USDC-ORP

**FOR THE DISTRICT OF OREGON**

**PORTLAND DIVISION**

**William X Nietzsche (solely as trustee for  
KRME International Trust),**

**Et al.,**

**3:18-CV-01930-SI**

**Plaintiff/Petitioner,**

**Case No.**

**PLAINTIFF'S MOTION FOR  
DEFAULT JUDGMENT AGAINST  
UNITED STATES CORPORATION  
COMPANY  
(PURSUANT TO FRCP RULE 55)**

**v.**

**FREEDOM MORTGAGE CORPORATION (FMC),**

**Et al.,**

**Defendant(s)/Respondent(s)**

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**PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT**

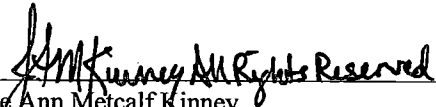
Plaintiff William and Julie Kinney ("The Kinney's"), by and through Plaintiff/trustee William X Nietzsche, hereby moves this Court of Record to enter an order for Default Judgment against defendant United States Corporation Company, stating in support:

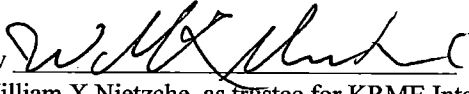
1. On April 9, 2019, defendant United States Corporation Company received a copy of plaintiff's First Amended Verified Complaint.
2. Defendant United States Corporation Company had 21 days to file a response to the summons and Verified Complaint.
3. As of this date defendant United States Corporation Company has failed to file any response to the First Amended Verified Complaint.

4. The Return of Service affidavit signed by Darnell Tellis is in the file showing date of service of plaintiff's summons and First Amended Verified Complaint served upon defendant United States Corporation Company.
5. The interest of justice and of the orderly administration of this court should result in entry of Default Judgment against defendant United States Corporation Company forthwith.

WHEREFORE, Plaintiffs move this Honorable Court of Record to enter an order for Default Judgment against defendant United States Corporation Company.

RESPECTFULLY DATED this 30 day of April, 2019.

By   
Julie Ann Metcalf Kinney  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]

By   
William X Nietzsche, as trustee for KRME International Trust  
In Solo Proprio, In Proper Persona,  
Sui Heredes, Sui Juris [Pro se]